



1 syntactical term and that it would not properly be identified as a trademark in such usage. Since the  
2 use in the text of the specification does identify the word as a trademark, that designation should be  
3 sufficient for the entire specification.

4 Applicants respectfully request the Examiner accept this revision to the specification.

5 Claims Rejected Under 35 U.S.C. §112

6 The Examiner has rejected Claims 9, 10, 18, and 19 for failing to particularly point out and  
7 distinctly claim the subject matter which applicants regard as the invention. The Examiner points out  
8 that Claims 9 and 18 include a trademark or trade name to identify a particular material or product.  
9 The Examiner objects to Claims 10 and 19 for reciting the term "composite graphic" without  
10 adequate definition in the specification. Applicants have amended Claims 9, 10, 18, and 19 to  
11 address the Examiner's objections, as further explained below.

12 Claims 9 and 18 have been amended to recite "JavaScript code," instead of "JavaScript," as  
13 was used in the specification and, for example, in U.S. Patent No. 6,623,529 B1 to Lakritz, which  
14 was applied by the Examiner in the present office action. Applicants respectfully request that the  
15 Examiner accept these amendments and consider them sufficient to resolve the Examiner's concerns.

16 Claims 10 and 19 have been amended to more distinctly point out and claim the subject  
17 matter, which applicants regard as their invention. More specifically, as indicated in the amended  
18 claims, above, the term "composite graphic" is now recited as including a plurality of elements  
19 including at least one of a graphics element and a text element located adjacent to each other such  
20 that the plurality of elements is associable as a single element. Applicants respectfully submit that  
21 this amendment fully addresses the Examiner's concerns.

22 Rejections Under 35 U.S.C. §102

23 The Examiner has rejected Claims 1-8, 11-17, and 20-26 as being anticipated by U.S. Patent  
24 No. 6,623,529 to Lakritz. The Examiner asserts that Lakritz describes each element of applicants'  
25 claimed invention. Although applicants respectfully disagree with this rejection, nevertheless,  
26 applicants have amended independent Claims 1, 12, and 21 to more clearly define the invention, as  
27 further discussed below. In the interest of reducing the complexity of the issues for the Examiner to  
28 consider in this response, the following discussion focuses on amended independent Claims 1, 12,  
29 and 21. The patentability of each remaining dependent claim is not necessarily separately addressed  
30 in detail. However, applicants' decision not to discuss the differences between the cited art and each

1 dependent claim should not be considered as an admission that applicants concur with the Examiner's  
2 conclusion that these dependent claims are not patentable over the disclosure in the cited references.  
3 Similarly, applicants' decision not to discuss differences between the prior art and every claim  
4 element, or every comment made by the Examiner, should not be considered as an admission that  
5 applicants concur with the Examiner's interpretation and assertions regarding those claims. Indeed,  
6 applicants believe that all of the dependent claims patentably distinguish over the references cited.  
7 However, a specific traverse of the rejection of each dependent claim is not required, since dependent  
8 claims are patentable for at least the same reasons as the independent claims from which the  
9 dependent claims ultimately depend.

10 With regard to amended independent Claims 1, 12 and 21, applicants have clarified the  
11 recited method of localizing objects in a markup language document to more clearly distinguish over  
12 Lakritz's teachings. Significant differences exist between Claim 1 and Lakritz as to how content of a  
13 document is changed that potentially results in significant differences in the accuracy with which  
14 documents are changed.

15 In the process described by Lakritz at Column 31, Lines 15-23, as relied upon by Examiner,  
16 Lakritz discloses inserting pairs of markup tags around words and/or phrases that a creator of the  
17 document may wish to have replaced before the document is presented, and then performing search  
18 and replace operations on the tagged words and/or phrases. Thus, for example, as described in  
19 Lakritz, if a creator of a document wanted to enable the word "hello" to be replaced by an equivalent  
20 word in a selected foreign language, the creator would insert word replace begin tags and word  
21 replace end tags (e.g., <!--WReplaceBegin--> and <!--WReplaceEnd-->) around the word "hello."  
22 Subsequently, before the document is to be presented and a translation of the word hello is desired, a  
23 textual search and replace operation is performed on the document. As part of the search and replace  
24 operation, each time a word, such as "hello," is encountered, a search is undertaken in a database for  
25 a translation for the word "hello." The word listed as the translation for the word "hello" in the  
26 database is then inserted into the document between the word replace begin tags and the word replace  
27 end tags, in place of the word "hello." Therefore, in sum, a search and replace operation on the  
28 document will be performed for every word or phrase tagged with word replace begin and word  
29 replace end tags.  
30

1 The process described by Lakritz may prove unworkable or impractical in attempting to  
2 localize objects in a document. One disadvantage of Lakritz is that it is prone to errors in situations  
3 where a word that the creator of the document desires to replace is subject to more than one meaning.  
4 In an example described in the present pending application, the document may describe the making  
5 of a presentation, where a person might present information on a topic. Taking the example of the  
6 word "present," "present" has a number of meanings. The word "present" may be used to mean "at  
7 the current time," or it may refer to a "gift," or it may refer to the "process of informing others on a  
8 particular topic." The last meaning – the process of giving information on a topic – is the desired  
9 meaning in the example given. Nonetheless, the word "present" translates differently into German  
10 for each meaning: at the present time translates to "gegenwärtig," gift translates to "geschenk," and  
11 inform translates to "unterrichten Sie." Using the process described by Lakritz to substitute for the  
12 word "present" therefore could result in an embarrassingly confusing and incorrect attempt to localize  
13 the word "present" to a different language.

14 In order to avoid such localization errors that can arise in the process taught by Lakritz, one  
15 might revise Lakritz's term replacement database to ensure that, when a search is made for a tagged  
16 word or phrase, only the desired translation for the word "present" appears in the term replacement  
17 database. Unfortunately, if the document contained the word "present" used in another context for a  
18 different intended meaning, the revised term replacement database would cause an incorrect  
19 translation to be substituted. Similarly, if it were desirable to use the term replacement database for  
20 localizing terms or phrases in a different document, revisions might have to be changed again –  
21 leaving one with the conclusion that the term replacement database may not be practical for  
22 localizing documents.

23 By contrast, paragraph (a) of Claim 1 as amended recites elements of a method that localizes  
24 objects in a markup language document so that when the markup language document is rendered by a  
25 browser, the objects are rendered to convey content in a specified language first by including a  
26 plurality of *descriptive* references in the markup language document referencing text, graphic, and/or  
27 media objects that are to include content in the specified language when the markup language  
28 document is rendered (emphasis added to highlight changes made in the current amendment).  
29 Applicants ask the Examiner to notice that, as recited in paragraph (a) of Claim 1, no substitutable  
30 content is included in the document to be rendered. Instead, paragraph (a) of Claim 1 recites that

1 only the references are included. Thus, paragraph (a) of Claim 1 recites a reference element not  
2 disclosed by Lakritz. Moreover, because Lakritz actually includes substitutable content in the  
3 document to be rendered, Lakritz includes an element not recited by Claim 1 and, thus, teaches away  
4 from the invention defined by Claim 1. Furthermore, the distinction between the elements of  
5 paragraph (a) and the process described by Lakritz is even clearer when one considers that Lakritz  
6 makes no provision for substitution of graphics and media objects in localizing a document. The  
7 search and replace process described by Lakritz makes no provision for searching graphics and media  
8 objects, and thus, discloses nothing that would allow for replacement of such content as recited in  
9 paragraph (a) of Claim 1. Applicants therefore submit that paragraph (a) of Claim 1 patentably  
10 distinguishes over Lakritz.

11 However, in amending paragraph (a) of Claim 1, applicants do not concede that the "word  
12 replace begin tags" and "word replace end tags" used by Lakritz are references or equivalent to  
13 references, as used by applicants in their claims. Applicants submit that these tags are instead merely  
14 delimiters because they do not refer to anything, but merely mark a point in a document. Similarly,  
15 placing such tags around a particular term or phrase merely marks the term or phrase, and does not  
16 create a reference. Put another way, placing the tags around a word or phrase does not create a  
17 reference that is in anyway descriptive of the tagged word or phrase. Accordingly, applicants submit  
18 that the present amendment further emphasizes a difference between the cited art and the present  
19 claimed invention, because paragraph (a) of Claim 1 recites including references in the document that  
20 actually provide for including anything describing content when the document is rendered, whether  
21 the content includes text, graphics, or media objects.

22 In addition paragraph (b) of Claim 1 also recites elements not disclosed by Lakritz. Paragraph  
23 (b) recites "providing a set of localized objects in the specified language, each localized object of the  
24 set being associated with a corresponding text, *graphic, and/or media object referenced in the*  
25 *markup language document*" (emphasis added). Once again, Lakritz fails to disclose any process by  
26 which graphic and/or media content is localized, because nothing in the word search and/or  
27 replacement process used by Lakritz is applicable to or teaches how graphic and/or objects may be  
28 evaluated in order to substitute a localized object of the same form. Thus, applicants submit that  
29 paragraph (b) of Claim 1 further patentably distinguishes over Lakritz.  
30

1 Finally, paragraph (c) of Claim 1 also recites elements not disclosed by Lakritz. Paragraph (c)  
2 describes inserting objects into the document *based on the plurality of descriptive references* such  
3 that when the markup language document is rendered, *the text, graphic, and/or media objects*  
4 referenced in the markup language document are rendered to convey content in the specified  
5 language. Again, Lakritz only teaches searching for and replacing textual content within the  
6 document, and does not teach or suggest substituting objects for references that describe the objects  
7 to be inserted. Thus, as previously described, the teachings of Lakritz are not operable to insert  
8 graphic and/or media objects into the document along with or instead of text. Applicants submit that  
9 paragraph (c) of Claim 1 thus further patentably distinguishes over Lakritz. Therefore, applicants  
10 respectfully request that the Examiner reconsider Claim 1 and withdraw the rejection of Claim 1 over  
11 Lakritz.

12 Similarly, Claim 12 as amended also patentably distinguishes over Lakritz. Paragraphs (a),  
13 (b), and (d) include the same elements as respectively recited in paragraphs (a), (b), and (c) of  
14 Claim 1. In addition, paragraph (c) of Claim 12 recites enabling a user to select a user interface  
15 language from among the plurality of different languages, and paragraph (d) of Claim 12 further  
16 recites that the text, graphic, and/or media objects referenced in the markup language document are  
17 rendered to convey content in the user interface language selected by the user. As previously  
18 described in connection with Claim 1, Lakritz does not disclose the insertion of objects, including  
19 text, graphics, or media objects based on *references* included in the document. Therefore, for the  
20 same reasons as Claim 1, Claim 12 patentably distinguishes over the process described by Lakritz.  
21 Claim 12 further adds the elements of paragraph (c), i.e., "enabling a user to select a user interface  
22 language from among the plurality of different languages," and of paragraph (d), i.e., rendering and  
23 conveying the content in the selected language. Lakritz does not describe inserting objects according  
24 to references in the document, let alone doing so in a language selectable by the user. Thus,  
25 applicants also ask the Examiner to find that Claim 12 patentably distinguishes over Lakritz.

26 Similarly, Claim 21 also patentably distinguishes over Lakritz. The Examiner reincorporates  
27 the bases applied for rejecting method Claim 1 in the rejection of system Claim 21. Applicants  
28 respectfully request the Examiner withdraw the rejection of Claim 21 over Lakritz, for the same  
29 reasons that Claim 1 patentably distinguishes over Lakritz, as noted above.

1 Because Claims 2-8 and 11 add additional recitation to define the invention as recited in  
2 Claim 1, Claims 13-17 and 20 add additional recitation to define the invention as recited in Claim 12,  
3 and Claims 22-26 add additional recitation to define the invention as recited in Claim 21,  
4 Applications ask the Examiner to also find that these Claims patentably distinguish over Lakritz.  
5 Again, applicants' decision not to discuss differences between the prior art and every claim element,  
6 or every comment made by the Examiner, should not be considered as an admission that applicants  
7 concur with the Examiner's interpretation and assertions regarding those claims. Indeed, applicants  
8 believe that all of the dependent claims patentably distinguish over the references cited. However, a  
9 specific traverse of the rejection of each dependent claim is not required, since dependent claims are  
10 patentable for at least the same reasons as the independent claims from which the dependent claims  
11 ultimately depend.

12 Rejections Under 35 U.S.C. §103

13 Claims 9 and 18 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Lakritz in  
14 view of "Basics of Server-Side JavaScript" (SSJ). The Examiner asserts that it would have been  
15 obvious to one of ordinary skill in the art at the time the invention was made to modify the method  
16 disclosed by Lakritz as disclosed by SSJ. However, Claim 9 depends from independent Claim 1,  
17 which is patentable for the reasons discussed above. Similarly, Claim 18 depends from Claim 12,  
18 which is patentable for the reasons discussed above. Because dependent claims are considered to  
19 include all of the elements of the independent claims from which the dependent claims depend,  
20 dependent Claims 9 and 18 are patentable for at least the same reasons discussed above with regard to  
21 independent Claims 1 and 12, respectively. Accordingly, the rejection of dependent Claims 9 and 18  
22 under 35 U.S.C. § 103(a) over Lakritz in view of SSJ should be withdrawn.

23 Furthermore, applicants deny that they admitted use of JavaScript to replace the text of tag  
24 elements in the way suggested by the Examiner, let alone in combination with Lakritz. Moreover, for  
25 the reasons described above to show how Lakritz could lead to erroneous language replacements,  
26 applicants deny that it would have been obvious to combine using JavaScript code with Lakritz in  
27 order to reach the inventions claimed. For these further reasons, applicants request withdrawal of the  
28 rejection of dependent Claims 9 and 18 under 35 U.S.C. § 103(a) over Lakritz in view of SSJ.

29 Claims 10 and 19 are rejected under 35 U.S.C. §103(a) as unpatentable over Lakritz in view  
30 of Bos et al., "Cascading Style Sheets, level 2, CSS2 Specification, W3C Recommendation" (Bos).

1 The Examiner asserts that it would have been obvious to one of ordinary skill in the art at the time the  
2 invention was made to modify the method disclosed by Lakritz, as further disclosed by Bos.  
3 However, Claim 10 depends from independent Claim 1, which is patentable for the reasons discussed  
4 above. Similarly, Claim 19 depends from Claim 12, which is patentable for the reasons discussed  
5 above. Because dependent claims are considered to include all of the elements of the independent  
6 claims from which the dependent claims depend, dependent Claims 10 and 19 are patentable for at  
7 least the same reasons discussed above with regard to independent Claims 1 and 12, respectively.  
8 Accordingly, the rejection of dependent Claims 10 and 19 under 35 U.S.C. § 103(a) over Lakritz in  
9 view of SSJ should be withdrawn.

10 Furthermore, for the reasons described above, applicants deny that Lakritz could be modified  
11 in accord with teachings of Bos or any other cited reference to achieve the invention claimed in  
12 Claims 10 and 19. As described above, use of Lakritz's search and replace methodology to find and  
13 replace textual strings is not viable to replace composite graphics with other graphics. Again,  
14 applicants request withdrawal of rejection of dependent Claims 10 and 19 under 35 U.S.C. § 103(a)  
15 over Lakritz in view of Bos.

16 In view of the amendments noted above and the Remarks set forth above, it will be apparent  
17 that the claims in this application define a novel and non-obvious invention, and that the application  
18 is in condition for allowance and should be passed to issue without further delay. Should any further  
19 questions remain, the Examiner is invited to telephone applicants' attorney at the number listed  
20 below.

21 Respectfully submitted,

22  
23  
24 Frank J. Bozzo  
25 Registration No. 36,756

26 FJB/RMA:lrg

27 MAILING CERTIFICATE:

28 I hereby certify that this correspondence is being deposited with the U.S. Postal Service in a sealed  
29 envelope as first class mail with postage thereon fully prepaid addressed to: Commissioner for Patents,  
30 Alexandria, VA 22313-1450, on August 6, 2004.

Date: August 6, 2004



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2 invention was made to modify the method disclosed by Lakritz, as further disclosed by Bos.  
3 However, Claim 10 depends from independent Claim 1, which is patentable for the reasons discussed  
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7 least the same reasons discussed above with regard to independent Claims 1 and 12, respectively.  
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12 Claims 10 and 19. As described above, use of Lakritz's search and replace methodology to find and  
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17 that the claims in this application define a novel and non-obvious invention, and that the application  
18 is in condition for allowance and should be passed to issue without further delay. Should any further  
19 questions remain, the Examiner is invited to telephone applicants' attorney at the number listed  
20 below.

21 Respectfully submitted,

22 *Ron Anderson*

23 Ronald M. Anderson

24 Registration No. 28,829

25 RMA:lrg

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Alexandria, VA 22313-1450, on August 6, 2004.

29 Date: August 6, 2004

30 Enclosure:

Amended FIGURE 6

*Linda D. Smith*